

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 0:22-CV-61553-DIMITROULEAS/HUNT

CRUZ VALDIVIESO FIGUERA,

Plaintiff,

vs.

ALL VIP CARE INC. AND LIZ
VELAZQUEZ MCKINNON,

Defendants.

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
RESPONSE TO DEFENDANTS' AMENDED MOTION FOR SUMMARY
JUDGMENT**

Plaintiff, Cruz Valdivieso Figuera, through her undersigned counsel, requests this Court grant her an extension of time to respond to Defendants' Motion for Summary Judgment [ECF No. 57], which relief is not objected to by the Defendant.

1. Defendants, All VIP Care Inc. and Liz Velazquez McKinnon, filed their Amended Motion for Summary Judgment (the "Motion") on July 14, 2022, making Plaintiff's response due on July 28, 2022.
2. Plaintiff requests until August 2, 2023 to respond to the Motion.
3. Undersigned counsel was in trial from July 10, 2023 to July 14, 2023 in Case No. 1:22-cv-22671.
4. Defendants filed their Motion on July 14, 2023.
5. After preparing for trial for more than one week, and being in trial for another week, undersigned counsel has been catching up on time-sensitive work in numerous cases.
6. As such, undersigned counsel is in need of an extension of time to respond to the

Motion.

7. The undersigned conferred with Defense counsel, who does not oppose the extension.

WHEREFORE, Plaintiff respectfully requests the Court grant the requested extension of time.

CERTIFICATE OF CONFERRAL

Pursuant to S.D. Fla. L.R. 7.1, I hereby certify that I contacted Defendants' counsel, Randy Goldberg, regarding the relief requested in this Motion. Mr. Goldberg confirmed that Defendants do not oppose the relief sought herein.

Respectfully submitted on July 25, 2022.

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